

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
sgizer@earlysullivan.com
2 Sophia S. Lau, Esq., Nevada Bar No. 13365
slau@earlysullivan.com
3 EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP
4 8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148
5 Telephone: (702) 331-7593
Facsimile: (702) 331-1652

6 Kevin S. Sinclair, Nevada Bar Number 12277
7 ksinciar@sinclairbraun.com
SINCLAIR BRAUN LLP
8 16501 Ventura Boulevard, Suite 400
Encino, California 91436
9 Telephone: (213) 429-6100
Facsimile: (213) 429-6101

10 Attorneys for Defendant
11 FIDELITY NATIONAL TITLE INSURANCE COMPANY

12 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
13 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

14 Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
15 Las Vegas, Nevada 89121

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18
19 WELL'S FARGO BANK, N.A. AS
TRUSTEE FOR PARK PLACE
20 SECURITIES, INC. ASSET-BACKED
PASS-THROUGH CERTIFICATES, SERIES
21 2005-WCW2,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

25 Defendants.
26

27 Case No.: 2:20-cv-02156-APG-NJK

28 **STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 11] AND MOTION
FOR FEES AND COSTS [ECF No. 12]**

(Second Request)

1
2 Defendant Fidelity National Title Insurance Company (“Fidelity”) and plaintiff Wells
3 Fargo Bank N.A. (“Wells Fargo”) hereby agree and stipulate as follows:

- 4 1. On November 23, 2020, Wells Fargo filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-20-825267-C;
- 6 2. On November 23, 2020, Fidelity removed the action to this Court;
- 7 3. On December 18, 2020, Wells Fargo filed a motion to remand and a motion for fees and
8 costs (ECF Nos. 11 and 12) (the “Motions”);
- 9 4. Fidelity’s current deadline to respond to the Motions is February 3, 2021;
- 10 5. Wells Fargo’s Motions are based upon the forum defendant rule, 28 U.S.C. § 1441;
- 11 6. The parties have mutually agreed to extend Fidelity’s deadline to respond to Wells
12 Fargo’s Motions by seven (7) days, to allow Fidelity to further evaluate whether the dissolution
13 of defendant Land Title of Nevada, Inc. impacts the Motions and its arguments regarding the
14 same;
- 15 7. Wells Fargo does not oppose the extension;
- 16 8. This is the second request for an extension which is made in good faith and not for
17 purposes of delay;

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 **IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's motion to
2 remand and the motion for fees and costs (ECF Nos. 11 and 12) is hereby extended through and
3 including Wednesday, February 10, 2021.

4

5 Dated: February 2, 2021

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

6

7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
8 Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY
9

10

11 Dated: February 2, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
13 Attorneys for Defendant FIDELITY
NATIONAL TITLE INSURANCE
COMPANY
14

15 Dated: February 2, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Darren T. Brenner
DARREN T. BRENNER
17 Attorneys for Plaintiff WELLS FARGO
BANK, N.A.
18

19 **IT IS SO ORDERED:**

20

21 Dated: February 2, 2021

22 By: 
UNITED STATES DISTRICT JUDGE
23



24
25
26
27
28
EARLY SULLIVAN
WRIGHT
GIZER &
MCRAE LLP
ATTORNEYS AT LAW

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ Valerie Segura

VALERIE SEGURA

An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP